**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCANNING TECHNOLOGIES INNOVATIONS LLC,	§ § §	
Plaintiff,	§ §	**Case No: 6:21-cv-00492**
vs.	§ §	**PATENT CASE**
EZ WEB ENTERPRISES, INC.,	§ § §	
Defendant.	§ § §	
	§	

ORIGINAL COMPLAINT

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC ("Plaintiff" or "STI") files this Original Complaint against EZ Web Enterprises, Inc. ("Defendant" or "EZ Web") for infringement of United States Patent No. 10,600,101 (hereinafter "the '101 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company having an address of 1801 NE 123 St., Suite 314, Miami, FL 33181.

4.   On information and belief, Defendant is a Texas corporation having a place of business at 2006 S Bagdad Road, Ste. 130, Leander, TX 78641. On information and belief,

Defendant may be served through its agent, Paracorp Incorporated, 14001 W. Hwy 29, Ste. 102, Liberty Hill, Texas 78642.

5.   On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6.   On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7.   Venue is proper in this District 28 U.S.C. §1400(b) because Defendant is deemed to reside in this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)

8.   Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq*.

10.   Plaintiff is the owner by assignment of the '101 Patent with sole rights to enforce the '101 Patent and sue infringers.
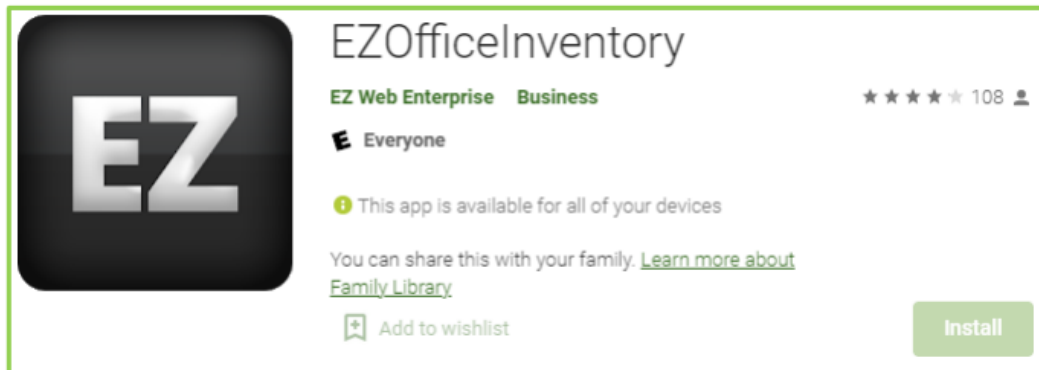
11.   A copy of the '101 Patent, titled "Systems and Methods for Indicating the Existence of Accessible Information Pertaining to Articles of Commerce," is attached hereto as Exhibit A.

12.   The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '101 Patent by making, using, importing, selling, and/or offering for sale an inventory management system covered by one or more claims of the '101 Patent. Defendant has infringed and continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.
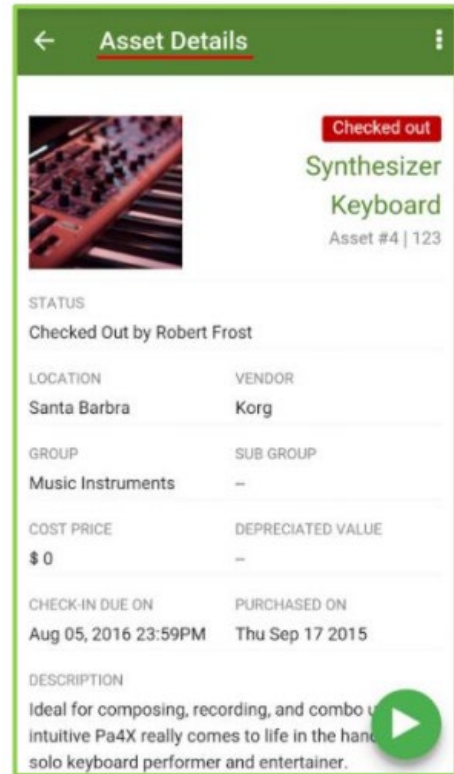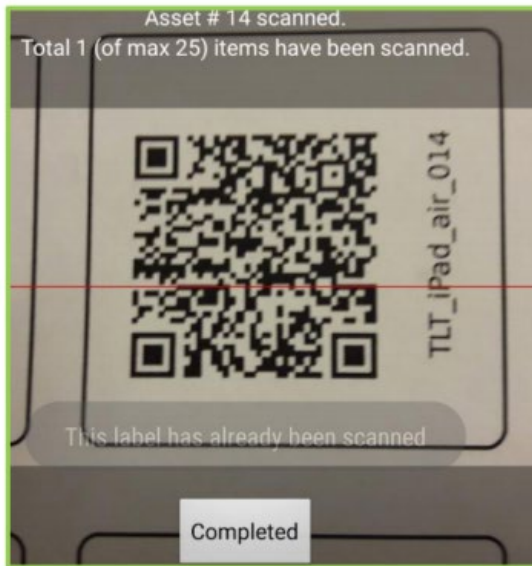
14.   Defendant sells, offers to sell, and/or uses an inventory system including, without limitation, the EZOfficeInventory system, any associated hardware and software, and any similar products (collectively, "Product"), which infringe at least Claim 1 of the '101 Patent.

15.   The Product provides an application for scanning barcodes to obtain a decoded link, which contains information about an article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.


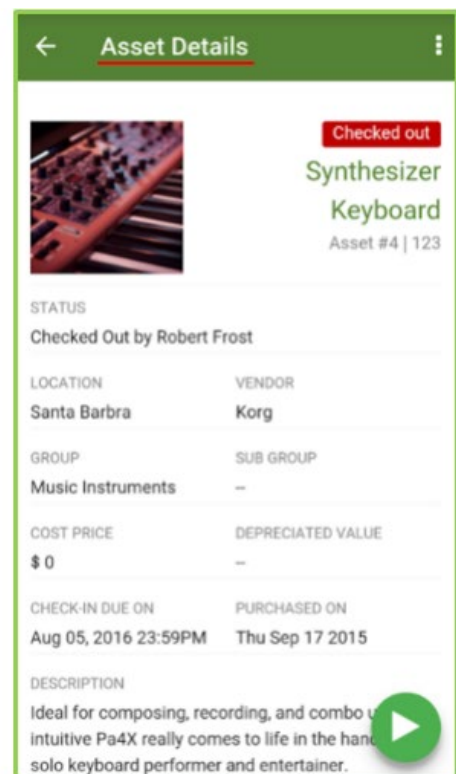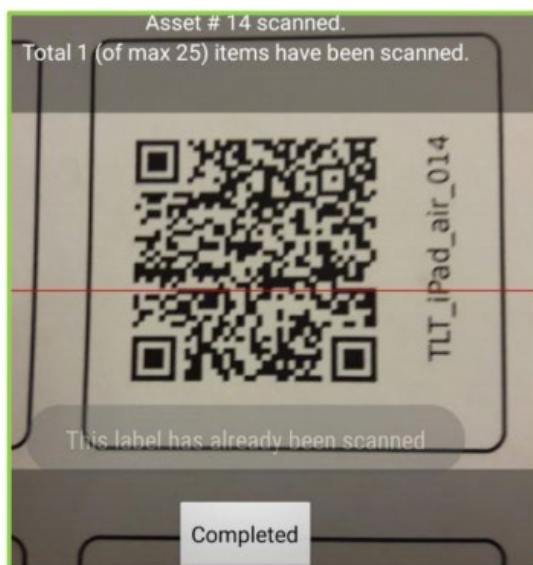Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

16.   The Product includes a mobile device comprising a portable handheld housing and a communication interface configured to enable the mobile device to communicate with a communication network. For example, the Product incorporates a handheld device (e.g., mobile device with Product software) and a communication interface (i.e. cloud based communication interface) configured to enable the handheld device to communicate with a communication network (e.g., cloud network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

EZOfficeInventory - Cloud based asset tracking software with support for checkout, checkin, reservations and audits. EZOfficeInventory is the leading asset tracking software used by 1000s of businesses. Supports both QR Code and barcode label scanning.
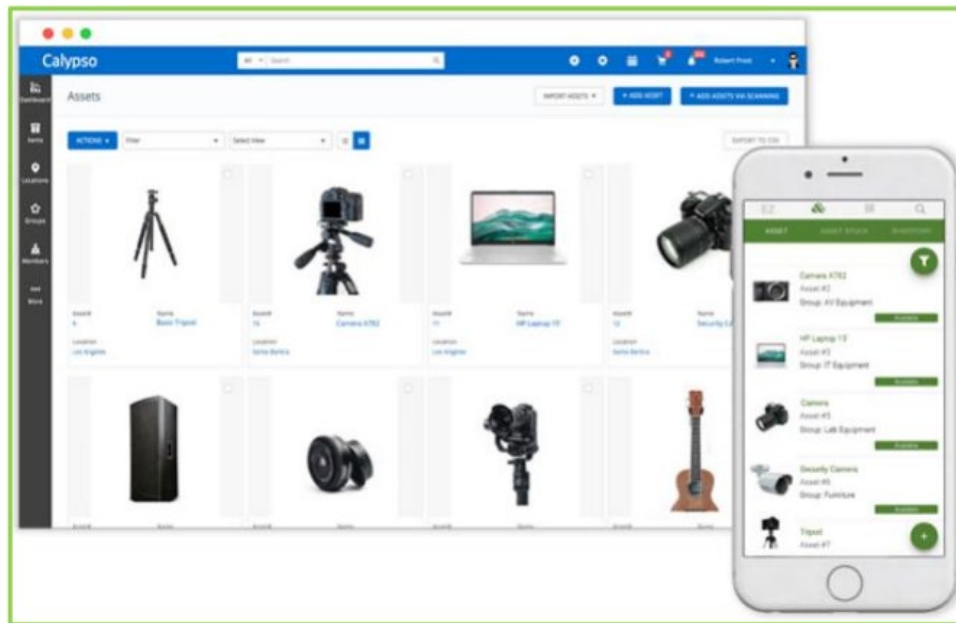
Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

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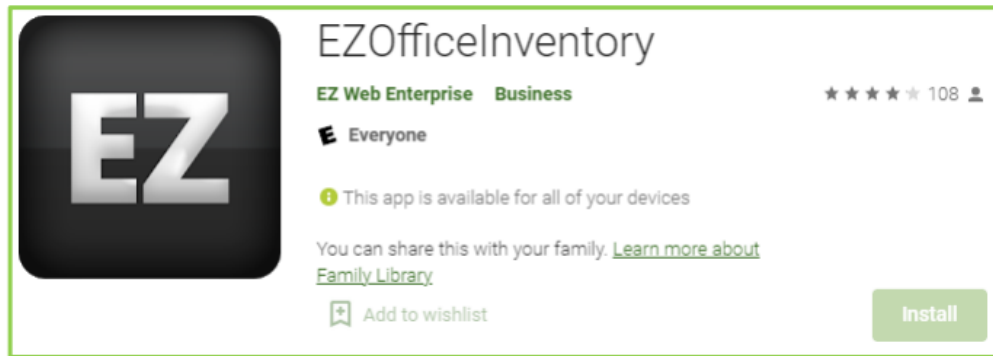
17.   The Product uses a signal processing device and a visual input device, the visual
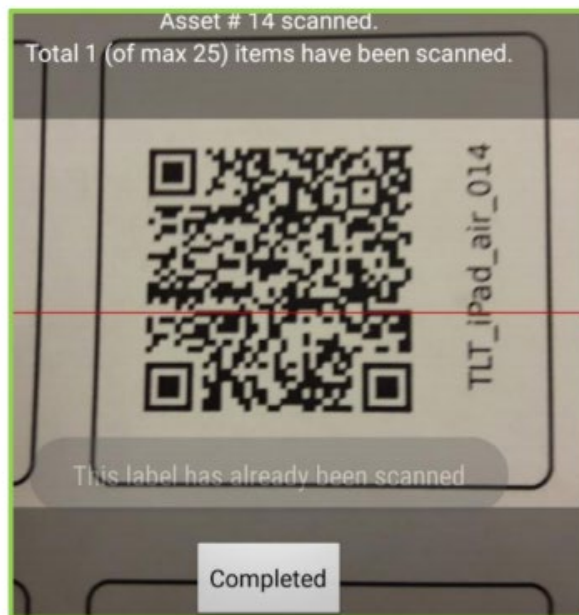
input device affixed within the portable handheld housing. For example, a visual input device (e.g., camera for scanning barcode) and signal processing device (i.e. processor of handheld device) are affixed within the portable handheld housing (e.g., the housing of the mobile device). The mobile device camera is used to scan a barcode and, via the Product's server, obtain details related to a particular product. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://www.ezofficeinventory.com/industries/av-equipment-tracking

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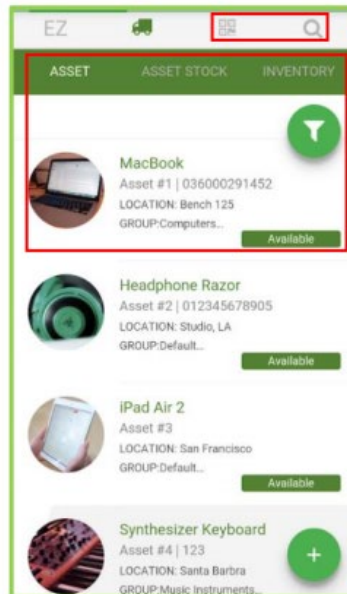
Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

18.   The Product comprises digital files associated with the mobile device. For example, the Product application has digital files (e.g., barcode image files and digital product information) associated with the mobile device. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US
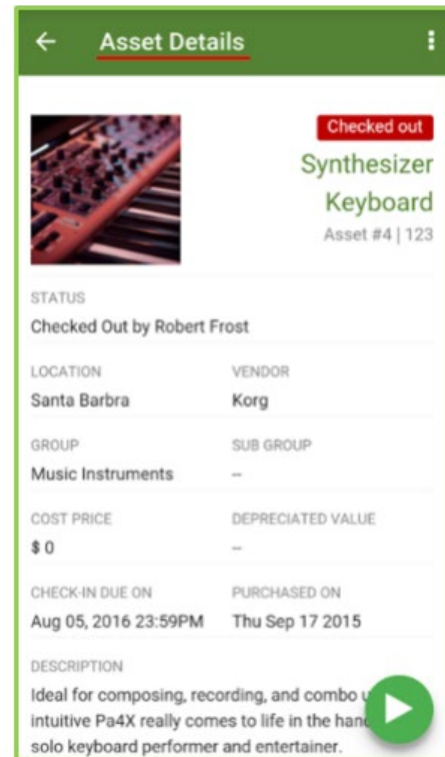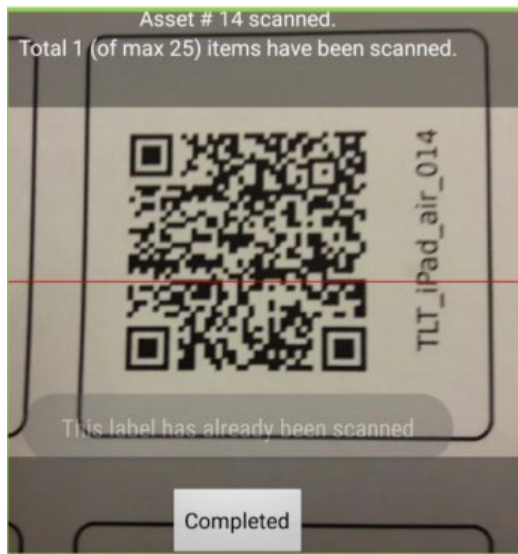
19.   The Product also includes a server in communication with the communication network, the server comprising a server database configured to store a look-up table that includes at least a plurality of bar codes associated with a plurality of articles of commerce. For example, the Product app communicates with a server through a cloud communication network, the server comprising look-up table (i.e. remote database). Also, the server database contains barcodes, each having associated information about a particular article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
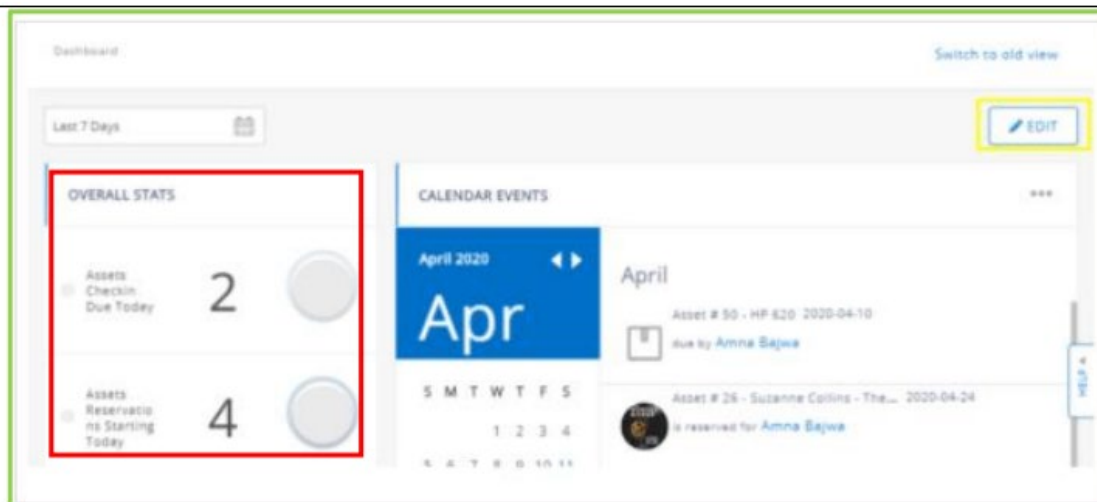
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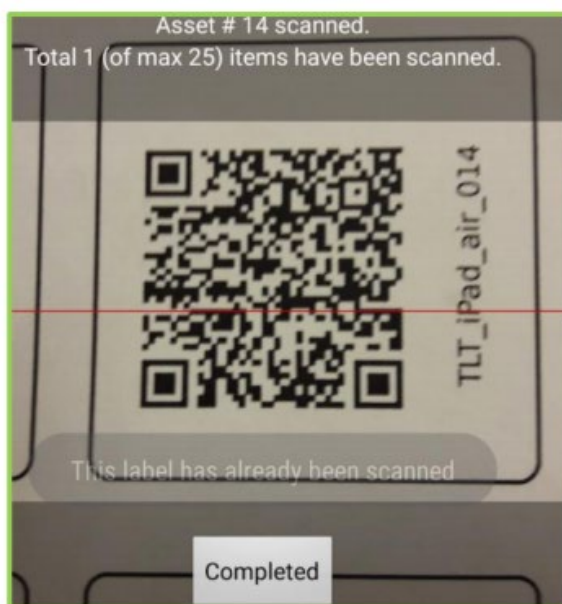

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

- We offer **comprehensive data management.** With actionable insights and customizable reports, you can have access to all kinds of availability and usage data, as well as countless reports and graphs created to guide you in making the best business decisions possible.

- Our **RFID, Barcode, and QR Code scans** enable you to track equipment across different locations and employees with ease. Not only do we integrate with third party label scanners, we also come bundled with a free mobile app that scans RFID tags, Barcodes and QR Codes in no time. In addition, our unlimited location-nesting makes it possible to track items down to the last cabinet or shelf.

- EZOfficeInventory's **fully-featured maintenance module** allows you to plan maintenance activities well in advance, create service tickets, set maintenance to repeat at regular intervals, and more. You can even prioritize maintenance tasks and flag assets up for maintenance right when they're checked back in. Our comprehensive service vendor management makes managing costs extremely easy.

- We're an **end-to-end asset management solution**, enabling you to draw up purchase orders, work orders, service tasks, asset retirement plans, and juggle all that with in-depth integrations with popular productivity-enabling apps such as Zendesk, Dropbox, ADFS, and more!

Source: https://www.ezofficeinventory.com/

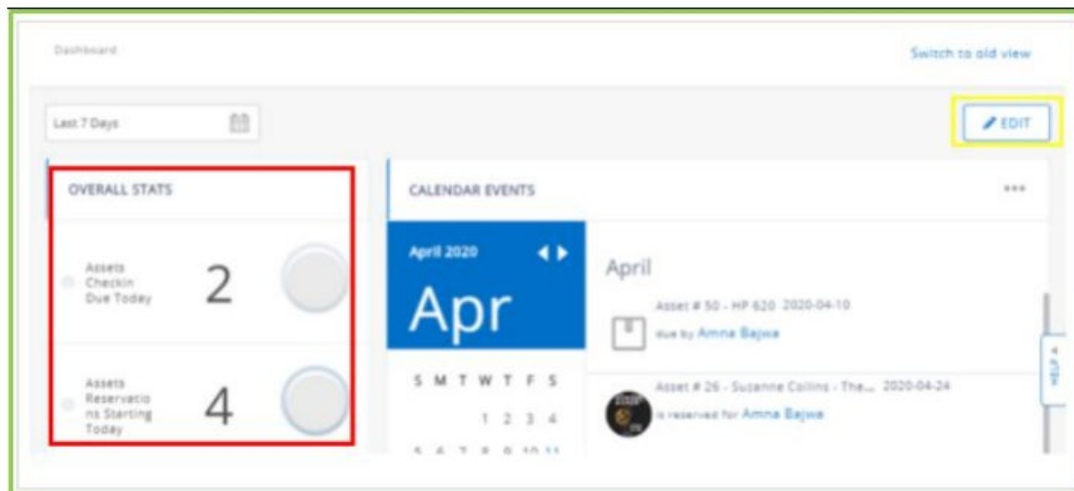Source: https://blog.ezofficeinventory.com/advanced-dashboard/

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

20.   The look-up table also stores a plurality of information link indicators, each information link indicator associated with a respective bar code and article of commerce. For example, the look-up table (i.e. remote cloud database accessed by the Product app/software)
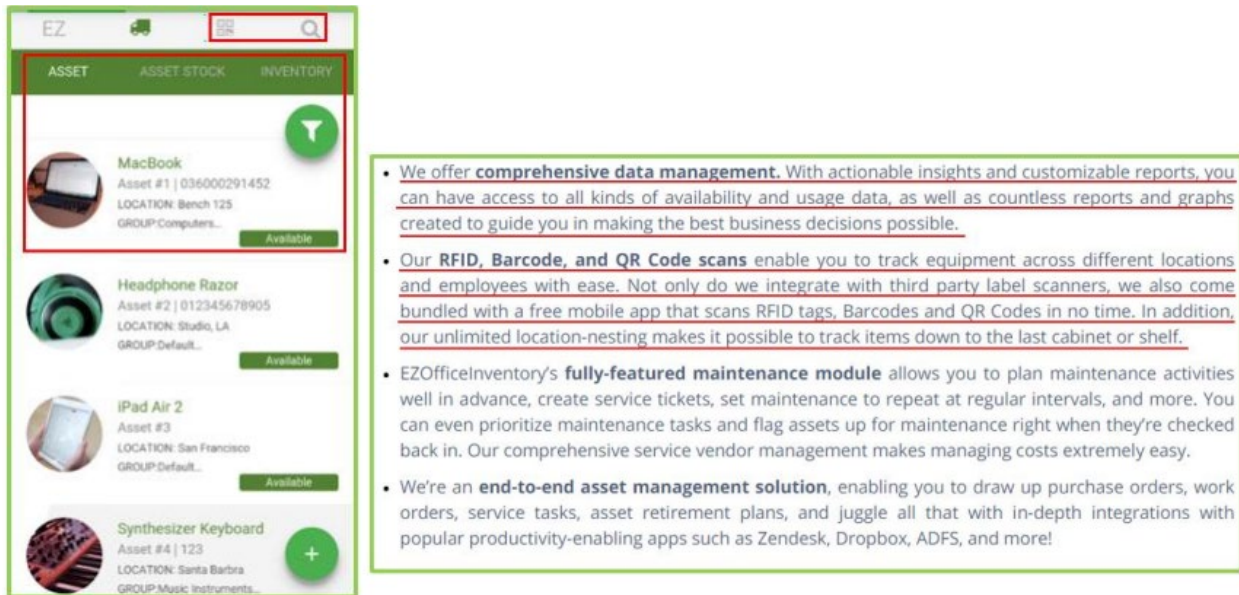
also stores a plurality of information link indicators (e.g., link indicating scanned product and/or validation of scanned barcode details associated with the product) indicating information associated with a respective barcode.   Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://www.ezofficeinventory.com/

Source: https://blog.ezofficeinventory.com/advanced-dashboard/

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US
Source: https://www.ezofficeinventory.com/

21.   Each information link indicator is configured as a status signal indicating the existence or absence of a link to information pertaining to a respective article of commerce, the link being made to the information via the communication network.   For example, each information link which is obtained by scanning a code indicates a status signal (e.g., link indicating validation of scanned code product and details associated with product). The information associated with the link is retrieved through the cloud communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

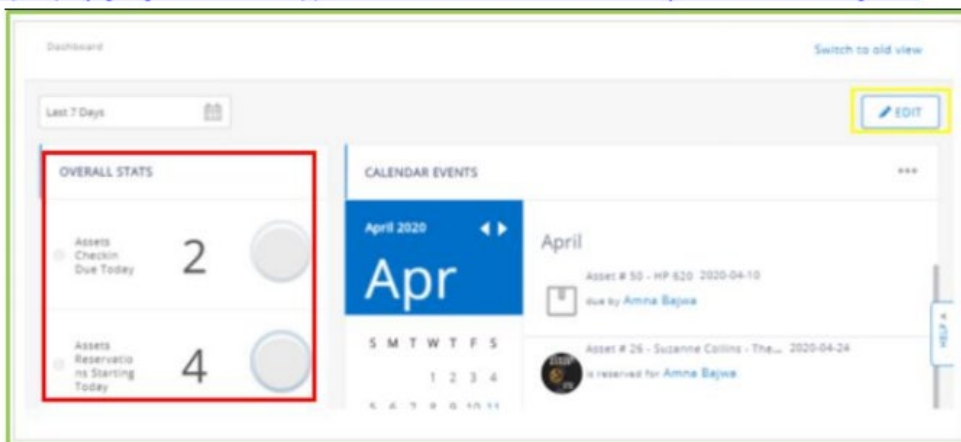Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

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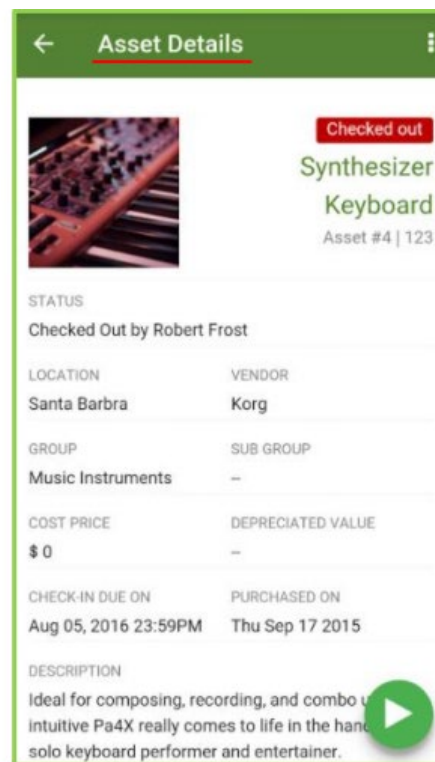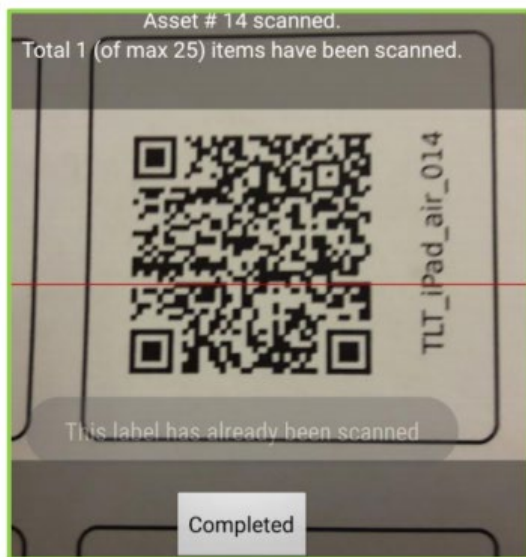Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

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22.   The visual input device is configured to scan an image of an article of commerce, decode the image to obtain a bar code and forward data from the scanned image to the signal processing device.   For example, the visual input device (i.e. handheld device camera) is configured to scan an image of a barcode associated with an article of commerce. After scanning the code, the code is decoded using Product software, which may be located on the mobile device, to retrieve information about the product.   The information is forwarded to the signal processing device (i.e. processor of mobile device). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

23.   In response to receiving the bar code, the signal processing device (i.e. mobile device) is configured to look up the code in the look-up table (i.e. remote database) to determine from a respective information link (e.g., link indicating validation of scanned barcode product) whether or not information pertaining to an article of commerce associated with the code (information about the associated product) may be accessed via the communication network.

Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
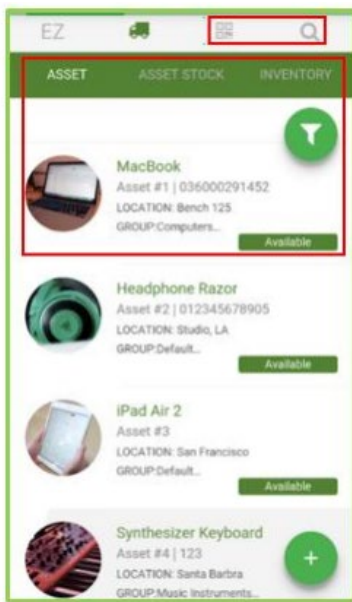

Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US
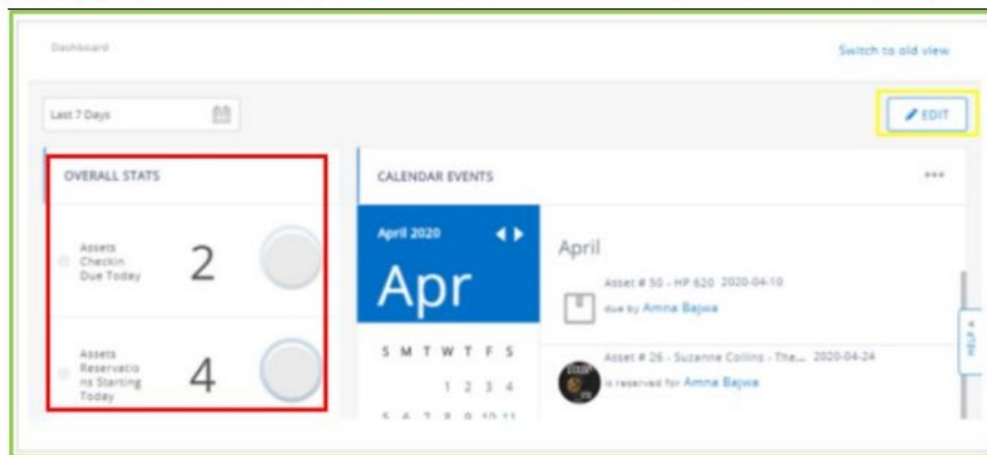
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Source: https://play.google.com/store/apps/details?id=com.ezofficeinventory.mobile2&hl=en&gl=US

Source: https://blog.ezofficeinventory.com/advanced-dashboard/

24.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

25.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

26.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 10,600,101 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c)   Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: May 12, 2021   Respectfully submitted,

                                       /s/ Jay Johnson
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                                       State Bar No. 24067322
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